

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

)
IN RE: NATIONAL PRESCRIPTION)
OPIATE LITIGATION)
)
This document relates to:)
The County of Summit, Ohio, et al. v. Purdue)
Pharma L.P., et al.) MDL No. 2804
Case No. 18-op-45090)
Hon. Dan A. Polster
and)
The County of Cuyahoga v. Purdue Pharma)
L.P., et al.)
Case No. 1:18-op-45004)
)

**NOTICE OF SERVICE OF DISTRIBUTOR DEFENDANTS'
MOTION FOR SUMMARY JUDGMENT
ON PROXIMATE CAUSATION GROUNDS AND SUPPORTING MATERIALS**

Pursuant to the Directions Regarding Filing of Briefs Under Seal, ECF No. 1719,
Defendants AmerisourceBergen Drug Corporation, Cardinal Health, Inc., H. D. Smith, LLC
f/k/a H. D. Smith Wholesale Drug Co., H. D. Smith Holdings, LLC, H. D. Smith Holding
Company, Henry Schein, Inc., Henry Schein Medical Systems, Inc., McKesson Corporation and
Prescription Supply Inc. ("Distributor Defendants") hereby provide notice that on June 25, 2019,
they served unredacted copies of the following documents on all Parties, the Court, and the
Special Masters:

- Distributor Defendants' Motion for Summary Judgment on Proximate Causation
Grounds;

- Memorandum in Support of Distributor Defendants' Motion for Summary Judgment on Proximate Causation Grounds;
- Declaration of Christian J. Pistilli in Support of Distributor Defendants' Motion for Summary Judgment on Proximate Causation Grounds, along with the corresponding Appendix A and Exhibits 1 to 48;
- [Proposed] Order Granting Distributor Defendants' Motion for Summary Judgment on Proximate Causation Grounds;
- Summary Sheet for Distributor Defendants' Motion for Summary Judgment on Proximate Causation Grounds (also attached hereto as Exhibit A).

Pursuant to the Directions Regarding Filing of Briefs Under Seal, Distributors also notified the following non-parties that their confidential information may be included in the filing: the federal Drug Enforcement Administration, the Ohio Board of Pharmacy and the Ohio High Intensity Drug Trafficking Area.

Dated: June 25, 2019

Respectfully Submitted,

/s/ Geoffrey E. Hobart
Geoffrey E. Hobart
Mark H. Lynch
Christian J. Pistilli
COVINGTON & BURLING LLP
One CityCenter
850 Tenth Street NW
Washington, DC 20001
Tel: (202) 662-5281
ghobart@cov.com
mlynch@cov.com
cpistilli@cov.com

Counsel for Defendant McKesson Corporation

/s/ Robert A. Nicholas
Robert A. Nicholas
Shannon E. McClure
REED SMITH LLP
Three Logan Square
1717 Arch Street, Suite 3100
Philadelphia, PA 19103
Tel: (215) 851-8100
Fax: (215) 851-1420
rnicholas@reedsmith.com
smcclure@reedsmith.com

Counsel for Defendant AmerisourceBergen Drug Corporation

/s/ Enu Mainigi
Enu Mainigi
F. Lane Heard III
George A. Borden
Ashley W. Hardin
WILLIAMS & CONNOLLY LLP
725 Twelfth Street NW
Washington, DC 20005
Tel: (202) 434-5000
Fax: (202) 434-5029
emainigi@wc.com
lheard@wc.com
gborden@wc.com
ahardin@wc.com

Counsel for Defendant Cardinal Health, Inc.

/s/ William E. Padgett
William E. Padgett (IN No. 18819-49)
Kathleen L. Matsoukas (IN No. 31833-49)
BARNES & THORNBURG LLP
11 South Meridian Street
Indianapolis, IN 46204
Tel: (317) 236-1313
Fax: (317) 231-7433
william.padgett@btlaw.com
kathleen.matsoukas@btlaw.com

Counsel for Defendants H. D. Smith, LLC f/k/a H. D. Smith Wholesale Drug Co., H. D. Smith Holdings, LLC and H. D. Smith Holding Company

/s/ John P. McDonald

John P. McDonald (TX Bar # 13549090)
C. Scott Jones (TX Bar # 24012922)
Lauren M. Fincher (TX Bar # 24069718)
Brandan J. Montminy (TX Bar # 24088080)
LOCKE LORD LLP
2200 Ross Avenue
Suite 2800
Dallas, TX 75201
Tel: (214) 740-8445
Fax: (214) 756-8110
jpmcdonald@lockelord.com
sjones@lockelord.com
lfincher@lockelord.com
brandan.montminy@lockelord.com

*Counsel for Defendants Henry Schein, Inc.
and Henry Schein Medical Systems, Inc.*

/s/ John J. Haggerty

John J. Haggerty (0073572)
James C. Clark
Stephan A. Cornell
FOX ROTHSCHILD LLP
2700 Kelly Road, Suite 300
Warrington, PA 18976
Tel: (215) 345-7500
Fax: (215) 345-7507
jhaggerty@foxrothschild.com
jclark@foxrothschild.com
scornell@foxrothschild.com

*Counsel for Defendant Prescription
Supply Inc.*

CERTIFICATE OF SERVICE

I, Geoffrey E. Hobart, hereby certify that the foregoing document was served via the Court's ECF system to all counsel of record.

/s/ *Geoffrey E. Hobart*
GEOFFREY E. HOBART